



COMPLIANCE PROGRAM

Human Rights Policy

Approved by the BoD at 16th of December 2024

Our legacy inspires and commits us to build a better world

At Mota-Engil, we aspire to be an example of integrity and respect for the people and for the planet, and as such, we commit to respect internationally recognised human rights across all our activities and throughout our global value chain. We take proactive steps to embed human rights into our operational policies and procedures.

We fully endorse the [UN Guiding Principles on Business and Human Rights](#) as well as the [OECD Guidelines for Multinational Enterprises for Responsible Business Conduct](#), and [related guidance](#). In line with these global standards, we are committed to conducting thorough human rights and environmental due diligence in order to identify and address the actual and potential adverse impacts with which we may be involved through our own activities and the ones of business relationships, and we endeavour to engage constructively with our stakeholders throughout the process, with special attention to the most vulnerable right-holders.

I. Our Mission: Building a Future with Purpose

As a family-owned and led business since our creation, we have been driven by enduring values that reflect our commitment towards the people with whom we work and the communities in which we operate. Along with our affiliated companies, subsidiaries and branches (hereinafter "Mota-Engil Group" or "Group"), we acknowledge the fundamental importance of respecting and promoting human rights across all our operations and activities, as well as the ones of our business relationships and commit to do so. At the core of this commitment is the equality in dignity and rights of every human being that we work with or that we may impact.

Our commitment towards human rights is embedded within the four pillars of our core values:

- **Ambition:** eagerness always renewed of doing more and better, facing the present and future with boldness and confidence and assuming, in a determined and committed way, new challenges that contribute to the growth of the Group.
- **Integrity:** Choose the path which reinforces the principles of honesty, truth, loyalty, righteousness and justice, in the daily conduct of everyone.

- **Cohesion:** Guarantee that the goals set, which are intended ambitious, are reached through the contribution of all business units and that the vitality of the Group results from combining wisdom and strength necessary to overcome new challenges.
- **Group spirit:** Consolidate the sense of belonging, respect for the differences, loyalty and reciprocity in a global and culturally diverse context, maintaining pride in the past and strengthening the confidence in the future.

In this context, the Mota-Engil Group's Human Rights Policy (hereinafter the "Policy" or "Human Rights Policy") has been developed to reflect our ongoing commitment toward the people and the planet which we recognise as essential to maintaining trust, fostering sustainable development, and ensuring that the future we build honours the past we are proud of. In line with our purpose, *"Our legacy inspires and commits us to build a better world"*.

II. Our Ambition: Reaching Beyond Our Borders

This Human Rights Policy is part of the Mota-Engil Group's Integrity and Compliance Program and is intended to be a progressive conscious approach. It is designed to be implemented and interpreted alongside other Group's documents, policies, rules, procedures, and initiatives, further defined in Annex I, which address specific aspects of human rights and sustainable development. In case of need for more detailed information, please consult the specific policies in questions.

The present Policy is applicable to all Mota-Engil's business units, markets/companies, contracts and projects in respective geographies, and shall be reflected in our operational policies and processes. It also covers employees, executives and directors of the Mota-Engil Group, as well as all subcontractors working on its sites or facilities. The expectations arising out of this Policy also extend to all our suppliers – who are also subject to our [Supplier's Code of Ethics and Conduct](#) – as well as our business partners, security providers, and other relevant external parties who are expected to align their actions and values with the provisions of this Policy, and any behaviour or activity that violates human rights will be actively addressed. We work in a collaborate way to ensure that the values detailed in this document are widely shared and embraced across our global value chain.

In joint ventures, consortiums, and/or other cooperation relationships, including entities not controlled by Mota-Engil's, the Group strongly encourage the awareness and adherence of

human rights standards that meet or exceed those outlined in this Policy. In all the relationships mentioned, the Mota-Engil Group actively collaborate to address the identified human rights issues.

Finally, this Policy guides all the interactions and relationships that the Mota-Engil Group establishes or will establish with its stakeholders, including with its employees, clients, shareholders, suppliers, business partners and the communities around its activities and operations, based on the principles and commitments described herein.

III. Our Commitment: More Than Just Business

As one of the leaders in the Engineering and Construction sector, with activities also in other sectors such as Waste Management, Energy, Concessions and Transport, Mining, and Logistics, and a global presence in over twenty countries, we acknowledge that our responsibility to respect human rights extends to these various sectors and geographies. This Human Rights Policy reflects our dedication to act with integrity, respect, and to contribute positively to the realisation of human rights wherever we operate. Our commitment towards human rights is embedded throughout the 5 principles that guide us: value creation, commitment, quality, innovation, and proximity.

To fulfil our commitment towards human rights, we endeavour to carry out meaningful human rights and environmental due diligence to identify and address the actual or potential adverse impacts with which we may be involved through our own activities and throughout our business relationships.

We recognize that operating in several countries with different legal frameworks presents unique challenges, and for this reason, aside from ensuring that all our operations comply, at minimum, with the local laws and regulations of the countries in which we operate, we strive to adhere to international human rights standards, including those described in Annex I.

We acknowledge the importance of using responsible purchasing policies that contribute to the realization of human rights, and that do not encourage actual adverse impacts on human rights, including the right to a clean, healthy, and sustainable environment.

We also recognise the importance of using our leverage to influence the adoption of good practices that are in line with the expectations on responsible business practices under the

international standards. We also believe that awareness-raising and capacity building initiatives within our business partners and communities play an important role as a way of demonstrating our commitment to fulfilling our responsibility to respect human rights and dedication to sustainability.

1. Our Human Rights Approach: Prioritising People

We recognise the importance of identifying and assessing the human rights risks that our activities may pose for the various stakeholder groups, and in particular:

- Our own workforce
- The contracted workers and the workers of our business partners in our supply chain
- The local communities potentially impacted by our activities
- Our consumers and end-users.

We have identified several human rights that can be significantly impacted by our activities for these stakeholders and have defined specific commitments in their respect:

Working Conditions

The Mota-Engil Group is committed to ensuring a safe and healthy working environment for all the Group's own employees, temporary employees, and trainees, as well as the employees, temporary employees and trainees of its business partners and their respective value chains. Additionally, we are committed to provide effective grievance mechanisms that allow workers to raise workplace-related concerns. Our specific commitments include:

- **Health and Safety:** The Group strives to ensure a safe and healthy working environment for its employees and maintain robust and effective health and safety measures and policies. We are committed to take active steps to prevent the risks of fatal accidents, occupational diseases, injuries and hazards from all our activities, and specific threats to women, and to have a fully integrated health and safety culture, disseminated to all the business units, markets/companies, contracts and projects in respective geographies in which we operate. We commit to provide our workers with personal protection equipment, as well as regular trainings addressing health and safety.

- **Mental Health and Well-Being:** The Group is committed to fostering a work environment that prioritizes mental health and well-being. We recognize the importance of mental health as integral to overall health and aim to create a supportive culture where everyone feels safe to speak openly about mental health challenges. We are dedicated to providing access to mental health resources, as we strive to ensure that our employees and the people we work with are empowered to thrive both personally and professionally. The Group is also committed to addressing and reducing psychosocial risks in the workplace, such as stress, burnout, and work-related mental health conditions. We believe in focusing on prevention, early identification, and support for those affected, as we aim to promote a safe and healthy working environment for all.
- **Security:** The Group recognises the unique challenges of operating in politically unstable regions and conflict-affected areas. We are committed to promoting security and stability in the regions and countries we operate. We implement tailored security protocols that respect international human rights standards, ensure the protection of our employees and stakeholders, and avoid contributing to local tensions. Our approach involves conducting heightened human rights due diligence, trainings, engaging with local stakeholders, and ensuring that our operations adhere to principles of conflict sensitivity.
- **Working Hours:** The Group endeavours to maintain reasonable working hours and prevent excessive work. The Group recognises the right to rest and leisure and ensures compliance, at minimum, with local laws, regulations and/or local customs regarding working hours and overtime. Additionally, we recognize the workers' entitlement to reasonable rest breaks and paid holidays in accordance with the legislation of the country where they work and the ILO standards.
- **Adequate and Fair Wages:** The Group strives to provide fair, decent and competitive wages that meet or exceed local minimum wage requirements and support a decent standard of living. We prioritise and commit with our best efforts to give workers remuneration which satisfies their basic needs and those of the members of their family who are directly dependent on them. Additionally, we support that remuneration conditions must be clearly communicated to workers and that equal pay must be provided for equal work.

- **Living Conditions:** The Mota-Engil Group is dedicated to ensuring suitable living conditions for workers, especially in remote or challenging locations. We recognize the importance of providing housing that provide adequate standards of safety, comfort, hygiene and privacy; supplying food and water that caters to the cultural diversity of workers and their dietary needs; guaranteeing their security and privacy; and ensuring access to healthcare services, including emergency medical care and preventive health measures.
- **Family life:** The Group is dedicated to providing applicable maternity and paternity leave and benefits that supports our employees in fulfilling their family responsibilities. We endeavour to provide applicable paid leave, flexible working arrangements and parental care arrangements to foster the health and well-being of our employees ensuring that they have the necessary resources and support during this important time.
- **Persons with Disabilities:** The Group fosters an inclusive workplace for persons with disabilities, ensuring equal opportunities in employment, reasonable accommodations, and accessibility. We are committed to eliminating barriers and promoting the full participation of individuals with disabilities in all business activities.
- **Worker Representation, Trade Unions and Strikers:** The Group respects and supports the freedom of association, the right to collective bargaining and the right to strike of workers. We firmly believe in the importance of engaging in negotiations, either individually or through employers' associations, to reach agreements on working conditions.
- **Child Labour:** The group pledge to act towards the eradication of child¹ labour and the protection of children. In this sense, we strongly position ourselves against any use of child labour and in line with ILO Conventions No. 138 and No. 182, we strive to eliminate the recruitment of children, the use of child labour. We endeavour to monitor our primary supply chain on a regular basis and, if incidents of child labour are identified, to take appropriate steps to remedy them.

¹ For the purposes of this commitment, "child" is defined as anyone under the age of fifteen, unless local laws stipulate a higher mandatory school leaving or minimum working age, in which case the higher age applies.

- **Forced Labour and Human Trafficking:** The Group strives to act towards the elimination of modern slavery, forced labour and human trafficking. The Group is committed to address any form of forced labour, whether in the form of prison labour, indentured labour, bonded labour or otherwise. It also condemns intimidation in any form, or as a means of coercion or as punishment on employees. We endeavour to monitor our primary supply chain on a regular basis and, if incidents of forced labour are identified, to take appropriate steps to remedy them.
- **Migrant Workers:** The Group promotes the inclusion, non-discrimination and the equal rights of migrant workers. The Group recognises the importance of denouncing the imposition of fees on candidates at any stage of the selection, recruitment and placement process. Furthermore, we condemn the use of coercion, deception or omission during the above-mentioned processes and the retention of workers' personal travel or identity documents or any other personal belongings for purposes other than those strictly necessary for registration with the authorities.

Equal Treatment and Opportunities

The Mota-Engil Group is committed to guaranteeing a culture of inclusion that promotes diversity. We strive to promote fair treatment, non-discrimination and equal opportunities for workers. Our specific commitments include:

- **Combatting discrimination:** The Group aims to fight all forms of discrimination of our employees in the hiring process, or in the workplace, including remuneration and benefits, training, promotion, transfer and termination. All employees should be treated fairly and in a non-discriminatory manner. We endeavour to fight discrimination of any type based on race, religion, nationality, disability, gender, age, place of residence, health status, pregnancy, marital and family status, family responsibilities, ethnicity, migrant status, sexual orientation and gender identify, trade union membership, political affiliation, economic or social situation.
- **Promoting gender equality:** The Group works to promote gender equality as an integral part of the Groups' culture for respect for human rights. In accordance with our Gender Equality Plan, we put our best efforts to prioritise and promote the development of actions that constitute positive practices in terms of combating discrimination and

inequalities against women, LGBTQIA+ and other vulnerable groups. We also actively work to promote and endeavour to adopt a gender-responsive approach to human rights due diligence.

- **Fighting harassment and Violence in the Workplace:** The Group is determined to ensure a working environment free from all forms of harassment, whether physical, verbal, sexual or psychological, where every individual is treated with dignity and respect. The Group does not tolerate the use of corporal punishment, threats of violence, offensive acts, comments, or demonstrations that humiliate, insult or cause embarrassment, or any act of intimidation or threat.
- **Diversity:** The Group strives to foster an inclusive culture that promotes diversity across all levels. We are committed to ensuring that a wide range of perspectives, backgrounds and experiences are represented and valued, including - but not limited to - race, sexual orientation, age, gender, disability, ethnicity, and nationality. We firmly believe that working environments must promote diversity based on a cross-cutting, global, social, and committed agenda, and free from discrimination.

Local Communities

The Mota-Engil Group is determined to ensure that we continue to be socially active and responsible members of society, by making a lasting and positive contribution to the countries and communities where we operate. We endeavour to prevent and address adverse impacts on the health and safety of the communities throughout the life of our projects. We also endeavour to avoid or mitigate adverse impacts on communities related to land acquisition and restriction of land use that may be linked to our projects. We consider it of the utmost importance to maintain an open and transparent engagement with the communities affected by our operations. We support these stakeholders with the development of infrastructures and corporate social responsibility initiatives, local hiring, and we encourage them in the works or activities, using local knowledge, goods, materials, services, and direct labour.

Indigenous Communities

The Mota-Engil Group is committed to supporting the unique and important rights of Indigenous people in the land, waters, and environment as well as their history, culture, heritage, and traditional ways, in line with international standards, the ILO Convention concerning Indigenous and Tribal Peoples in Independent Countries, No. 169, and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). Wherever possible and before starting a project that may impact Indigenous Peoples, and throughout the project's life cycle, we are determined to maintain an ongoing dialogue with the representatives of the relevant Indigenous Communities and, where relevant, to obtain Free, Prior, and Informed Consent (FPIC). We also believe in the importance of establishing a grievance mechanism accessible to the communities and of developing and implementing remediation plans to respond to the complaints raised.

Environment

In order to protect the right of a clean, healthy, and sustainable environment as human right, the Mota-Engil Group is dedicated to minimizing its environmental impacts and impacts on human health by avoiding or minimizing pollution arising out of our project activities. We also endeavour to contribute to the protection and conservation of biodiversity. We also commit to promote more sustainable use of resources, including water and energy and to reduce our carbon emissions and waste through the adoption of strategic targets in line with our [“Building 26: For a sustainable future - Strategic Plan 2022-2026”](#). In this sense, our SHEQ policy seeks to respond to the challenges of climate change, ecosystems and natural habitats degradation and the scarcity of natural resources through comprehensive measures and policies to address and mitigate environmental damage and promote sustainable practices in all our projects.

Corruption

The Mota-Engil Group is committed to maintaining the highest standards of ethics and transparency. In addition, we believe in the importance of conducting business with integrity and implementing stringent anti-corruption policies and practices to prevent bribery, money laundering, terrorist financing, fraud, and other corrupt activities. For more information on our specific anti-corruption policies and practices, please refer to our relevant policies.

IV. A Continuous Journey

The Mota-Engil Group is dedicated to fostering a culture of respect for human rights across all aspects of its operations. This Human Rights Policy serves as a cornerstone of our commitment to ethical business practices, ensuring that dignity, fairness, and respect guide our interactions with all stakeholders.

Approved by our Board of Directors and subject to periodic reviews, this Policy is a living document that adapts to our evolving needs and the changing landscape of human rights.

The implementation of this Policy is under the responsibility of the Corporate Compliance Department of Mota-Engil. Mota-Engil's Executive Committee, senior management and operational managers are to set an example, guide and support their teams in complying with it. We strive to lead by example, influencing our value chain and business partners within it to adopt and uphold these standards.

Our efforts are not only aimed at compliance but also at promoting sustainable development and social responsibility in every community we touch.

ANNEX I

Mota-Engil's Human Rights Policy Framework:**External References**

Informed by internal and external expertise, this Policy reflects a comprehensive and informed commitment from Mota-Engil to respect human rights. To this end, the methodology used to develop this policy relied on a thorough analysis of internal relevant documents, policies, and contracts, as well as international standards which are references in the field of Business and Human Rights. The approach adopted followed the recommendations of the UN Global Compact in its [Guide for Business on How to Develop a Human Rights Policy](#). Internal and external stakeholders from different regions and sectors were consulted, through interviews, in order to include their perspectives and expectations, and to map the most salient human rights risks and priorities.

Building on these insights, our commitment to adhere to a framework of key international instruments, standards and initiatives on human rights, include, *a minima*:

- United Nations' Declarations, Multilateral Treaties, and Resolutions
 - [The Universal Declaration of Human Rights \(UDHR\)](#).
 - [The International Covenant on Civil and Political Rights \(ICCPR\)](#).
 - [The International Covenant on Economic, Social and Cultural Rights \(ICESCR\)](#).
 - [The United Nations Declaration on the Rights of Indigenous Peoples \(UNDRIP\)](#).
 - [The General Assembly Resolution A/RES/76/300 on the right to a clean, healthy and sustainable environment](#).
- International Labour Standards
 - The Fundamental Conventions of the International Labour Organisation (ILO).
 - [Freedom of Association and Protection of the Right to Organise Convention \(No. 87\)](#).
 - [Right to Organise and Collective Bargaining Convention \(No. 98\)](#).
 - [Forced Labour Convention \(No. 29\)](#) (and its [2014 Protocol](#)).
 - [Abolition of Forced Labour Convention \(No. 105\)](#).
 - [Minimum Age Convention \(No. 138\)](#).
 - [Worst Forms of Child Labour Convention \(No. 182\)](#).
 - [Equal Remuneration Convention \(No. 100\)](#).
 - [Discrimination \(Employment and Occupation\) Convention \(No. 111\)](#).
 - [Occupational Safety and Health Convention \(No. 155\)](#).

- [Promotional Framework for Occupational Safety and Health Convention \(No. 187\)](#).
- [The ILO Convention concerning Indigenous and Tribal Peoples in Independent Countries \(No. 169\)](#).
- International Soft-Law Instruments
 - [The OECD Guidelines for Multinational Enterprises for Responsible Business Conduct](#).
 - [The OECD Due Diligence Guidance for Responsible Business Conduct](#).
 - [The UN Guiding Principles on Business and Human Rights](#).
 - [The UN Corporate Responsibility to Respect Human Rights: An Interpretive Guide](#).
 - [The Gender Dimensions of the Guiding Principles on Business and Human Rights](#).
 - [The UN Access to Remedy in Cases of Business-related Human Rights Abuse: An Interpretive Guide](#).
- IFC requirements under the [IFC Sustainability Framework](#)

Internal References

Our Human Rights Policy is designed to work in alongside our other policies and initiatives, ensuring a comprehensive approach to human rights and sustainability. These include, more specifically:

- [The Building 26: For a sustainable future - Strategic Plan 2022-2026](#).
- [The Plan for Gender Equality](#).
- [The Safety, Health, Environment and Quality \(SHEQ\) Policy](#).
- The Integrity and Compliance Program, of which this Policy is part, and that also includes namely:
 - [The Code of Ethics and Business Conduct](#).
 - The Anti-Harassment and Discrimination Policy.
 - [The Whistleblowing and Non-Retaliation Policy](#).
 - [The Anti-Corruption and Bribery, Prevention of Money Laundering and Terrorist Financing Policy](#).
 - [Supplier Code of Ethics and Conduct](#).